

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JDM IMPORT CO. INC., MG WORLDWIDE LLC, and  
ASIA PACIFIC JEWELRY, L.L.C.,

Plaintiffs,

v.

Case No. 1:20-cv- 08759-VEC

SHREE RAMKRISHNA EXPORTS PVT., LTD,  
AMIT SHAH, and THE JEWELRY CO.,

Defendants.

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**DECLARATION OF RAHUL DHOLAKIA IN SUPPORT  
OF MOTION TO DISMISS**

Rahul Dholakia, under penalty of perjury and pursuant to 28 U.S.C. § 1746,  
declares the following to be true and correct:

1. I am a Director of Shree Ramkrishna Exports Pvt., Ltd. I submit this Declaration in support of defendants' motion to dismiss the Amended Complaint. Unless otherwise indicated, the following statements are based on my personal knowledge.

**Shree Ramkrishna Exports Pvt., Ltd**

2. Shree Ramkrishna Exports Pvt., Ltd. ("SRK") is organized under the laws of India. Its principal place of business is CC-6055, Bharat Diamond Bourse, G Block, Bandra Kurla Complex, Bandra East, Mumbai 400051 Maharashtra, India. SRK does not maintain, and has never maintained, an office in New York. SRK does not have any employees in New York and is not registered to do business in New York. SRK does not own any property in New York. While SRK does, on occasion, sell jewelry merchandise to certain customers located within New

York, sales to New York customers comprise only approximately 14% of SRK's annual business.

**No Agency Relationship With TJC Jewelry, Inc.**

3. Neither TJC Jewelry, Inc. ("TJC") nor its President, Ashish Shah, are now, nor have they ever been an officer, shareholder, employee, sales consultant or agent of SRK. TJC has not served as an agent of SRK and had no authority to act generally on SRK's behalf now or during the relevant time period. TJC is also not a subsidiary of SRK and SRK has never held an ownership interest in TJC, nor did it control TJC during the relevant time period. Further, no representative of SRK has served as an officer, director or employee of TJC at any time.

Dated: March 30, 2021



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Rahul Dholakia